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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TINU KHANNA,
aka Gagan Khanna

Defendant.

CASE NO. 2:22-CR-0213-KJM

STIPULATION TO HOLD ARRAIGNMENT
VIA VIDEO TELECONFERENCE; ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and Defendant Tinu Khanna, by and through his counsel of record, hereby stipulate to hold the Defendant's arraignment on the first superseding indictment via video teleconference pursuant to Fed. R. Crim P. 10(c), and stipulate to the following:

1. Defendant fully understands his rights under the Federal Rules of Criminal Procedure to have his arraignment conducted in open court in person. He knowingly, voluntarily, and intelligently consents to proceed with his arraignment via video teleconference pursuant to Fed. R. Crim. P. 10(c).

2. Defendant affirms that he has received a copy of the first superseding indictment and intends to plead not guilty at the arraignment.

3. Good cause exists to proceed with arraigning the Defendant on the superseding

indictment via video teleconference because he lives in New Jersey and has a waiver of appearance on file with the Court. (ECF No. 158.)

4. Defendant was previously arraigned on the initial indictment in person on December 15, 2022. (ECF No. 82.)

5. The United States does not oppose proceeding to arraign the Defendant on the superseding indictment via video teleconference.

6. Both the defendant and his counsel of record, Peter Kmeto, may appear via video teleconference for arraignment.

7. Defendant and the United States request that the arraignment be scheduled for April 15, 2024, at 1:00 pm via video teleconference before the Honorable Deborah Barnes.

Dated: April 4, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Veronica Alegría
VERONICA M.A. ALEGRÍA
Assistant U.S. Attorney

Dated: April 4, 2024

/s/ Peter Kmeto
PETER KMETO
Counsel for Defendant
Tinu Khanna

Dated: April 4, 2024


TINU KHANNA
Defendant

ORDER

The Court having read and considered the parties' stipulation, and good cause appearing, approves to proceed with the Defendant's arraignment on the superseding indictment via video teleconference pursuant to Fed. R. Crim. P. 10(c). Arraignment will be set for April 15, 2024, at 1:00 p.m. via video teleconference, where both the defendant and the defendant's attorney may appear via video teleconference.

April 12, 2024

Date



DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE